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12 Attorneys for Defendants
SONY NETWORK ENTERTAINMENT AMERICA, INC. and
13 SONY COMPUTER ENTERTAINMENT AMERICA LLC

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 ROBERT M. BOVA, individually and on behalf
19 of all others similarly situated,

20 Plaintiff,

21 v.

22 SONY NETWORK ENTERTAINMENT
23 AMERICA, INC., a Delaware Corporation and
SONY COMPUTER ENTERTAINMENT
24 AMERICA LLC, a Delaware Limited Liability
Company,

25 Defendants.

Case No. 3:11-cv-02316-EDL

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Magistrate Judge Elizabeth D.
Laporte

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 3:11-cv-02316-EDL

1 WHEREAS, defendants Sony Network Entertainment America, Inc. (“SNEA”) and Sony
2 Computer Entertainment America LLC (“SCEA”), as well as certain related entities (collectively,
3 the “Sony Defendants”), have been named as defendants in at least nineteen (19) putative class
4 action lawsuits within this District, to date (collectively, the “N.D. Cal. Sony Litigations”);

5 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
6 least fourteen (14) putative class action lawsuits pending outside this District, to date, including at
7 least five (5) suits in the Central District of California, one (1) suit in the Southern District of
8 California, one (1) suit in the Southern District of New York, one (1) suit in the Eastern District
9 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of
10 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of
11 Connecticut, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal.
12 Sony Litigations, the “U.S. Sony Litigations”);

13 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
14 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
15 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
16 2011.

17 WHEREAS, the current deadline for SCEA and SNEA to respond to the Complaint is
18 June 1, 2011;

19 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
20 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
21 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
22 JPML;

23 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
24 by and through their respective counsel, hereby stipulate as follows:

25 The deadline for the defendants to respond to the Complaint in the above-captioned action
26 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
27 litigation centralizing the above-captioned action with other matters, or if centralization is denied
28 by the JPML, then 30 days from the date of such order denying centralization.

1
2 Dated: May 16, 2011
3
4

FRANCIS M. GREGOREK
BETSY C. MANIFOLD
WOLF HALDENSTEIN ADLER FREEMAN &
HERZ LLP

5 By: /s/ Betsy C. Manifold /s/ [as authorized]
6 Betsy C. Manifold

7 Attorneys for Plaintiff
8 ROBERT M. BOVA

9 Dated: May 16, 2011
10
11

HARVEY WOLKOFF
THAD A. DAVIS
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12 By: /s/ Rocky C. Tsai /s/
13 Rocky C. Tsai

14 Attorneys for Defendants
15 SONY NETWORK ENTERTAINMENT
16 AMERICA, INC. and SONY
17 COMPUTER ENTERTAINMENT
18 AMERICA LLC

19 **PROPOSED ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.
21

22 Dated: May 18, 2011

23 By: Elizabeth D. Laporte Judge
24

